

to said objections and without waiving same, Plaintiff states that she was trafficked and engaged in commercial sex off and on from 2013 through 2019. Plaintiff does not recall the exact dates she was trafficked or engaged in commercial sex.

Discovery is ongoing. Plaintiff reserves the right to supplement this response as appropriate during the course of this litigation.

23.

Please state whether You have been trafficked for sex at any lodging facility other than the Days Inn and if Your response is in the affirmative, please provide the dates of such trafficking, the location(s), and the name(s) of the sex trafficker.

PLAINTIFF'S RESPONSE: Plaintiff states that she was trafficked at the following hotels:

1. December 2012- Days Inn by Wyndham located at 2191 Northwest Parkway S.E., Marietta, Georgia 30067- several days by Corey E. Jackson;
2. Around 2014/2015: Plaintiff was trafficked out of various hotels in Georgia. Plaintiff recalls being at the Master's Inn, the Budgetel, the America's Best Value Inn/Knights Inn, the Days Inn on Peachtree

- Industrial Boulevard, and the Studio 6. Plaintiff was trafficked by Derek Rogers, who went by the name “Low”;**
- 3. Around March 2015 through the middle of 2016: Red Roof Inn, located at 2200 Corporate Plaza, Smyrna, Georgia by traffickers Nutso, Batchi, and E;**
- 4. Plaintiff was trafficked at the Super 8 on 1600 Crescent Centre from approximately 2016 through 2017 by Batchi.**

Plaintiff further states that she was also trafficked in New Jersey, Maryland, Virginia, and Las Vegas.

Discovery is ongoing. Plaintiff reserves the right to supplement this response as appropriate during the course of this litigation.

Respectfully submitted this 3rd day of January, 2024.

ANDERSEN, TATE, and CARR, P.C.

/s/ Jonathan S. Tonge

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